

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY
TRENTON DIVISION

IN RE JOHNSON & JOHNSON)	MDL NO. 3:16-md-2738 (MAS) (RLS)
TALCUM POWDER PRODUCTS)	
MARKETING, SALES PRACTICES AND)	JUDGE MICHAEL A. SHIPP
PRODUCTS LIABILITY LITIGATION)	MAG. JUDGE RUKHSANAH L. SINGH
)	
)	RESPONSE TO APRIL 16, 2025
)	ORDER TO SHOW CAUSE (DKT. 33664)

THIS DOCUMENT RELATES TO:

TAMBURELLO, JOANNE B, et al.	3:20-cv-00023
ALLBACK, CLAIRE, et al.	3:20-cv-00024
LEONARDI, KAREN, et al.	3:20-cv-00026
BARAN, EMILIA, et al.	3:20-cv-00072
KYE, SHERRON, et al.	3:20-cv-00073
WAGNER, BARBARA, et al.	3:20-cv-00084
KHALID, SHAISTA, et al.	3:20-cv-00085
SKOUTELAS, VASILIKI, et al.	3:20-cv-00087
SMOUDIANIS, CHRISTINE, et al.	3:20-cv-00092
GONZALEZ, ANNE, et al.	3:20-cv-00094
BARTASI, MARC, et al.	3:20-cv-00095
FARMER-JORDAN, SHIRLEY, et al.	3:20-cv-00172
WILSON, JOYCE M, et al.	3:20-cv-00185
LETKE, FRANK, et al.	3:20-cv-00244
BRIDGEWATER, DOW LEE, et al.	3:20-cv-00245
MONTANEZ, ROLANDO, et al.	3:20-cv-00290
DARR, GUY, et al.	3:20-cv-00294
DAVIS, ARTHUR, et al.	3:20-cv-00326
PATTIT, RONALD, et al.	3:20-cv-00667
DETORRE, ROBERT, et al.	3:20-cv-00740
PATRICIA, HAMILTON, et al.	3:20-cv-00804
BARNSTORF, PAUL, et al.	3:20-cv-01702
KOLESAR, GAIL, et al.	3:20-cv-01704
MALANOSKI, ROSEMARIE, et al.	3:20-cv-01753
WOOD, JAYNE A, et al.	3:20-cv-02077
SWEAT, KELLY ANN, et al.	3:20-cv-02269
PEAY, TIFFANY, et al.	3:20-cv-02281
MEIROWITZ, CLIFFORD ALLEN, et al.	3:20-cv-02293
NORTON JUNIOR, JOHN P, et al.	3:20-cv-02310
FRANCIS, MICHAEL, et al.	3:20-cv-02312

ARNOLD, KATHRYN, et al.	3:20-cv-02711
FOSTER, THOMAS, et al.	3:20-cv-02762
RODRIGUEZ, KATHLEEN L, et al.	3:20-cv-03150
HOLMES, GEORGE, et al.	3:20-cv-05712
AMENDOLA, RACHELLE, et al.	3:20-cv-05717
SEVERINO, JEREMIAH D, et al.	3:20-cv-05723
ROMANI, VIVIAN, et al.	3:20-cv-05761
BIBER, JOHN, et al.	3:20-cv-05951
COOPER, WILLIAM, et al.	3:20-cv-06375
DRZYMALA, WAYNE, et al.	3:20-cv-07606
RENFORD, TANYA, et al.	3:20-cv-07607
MAJCHER, CHRISTIE L, et al.	3:20-cv-07609
VERA, ELIZABETH, et al.	3:20-cv-08237
BUFFAMONTI, MICHAEL, et al.	3:20-cv-08394
MAGNANTI, JAMES, et al.	3:20-cv-08711
FILICETTI, KAREN, et al.	3:20-cv-09525
LOVELAND, NANCY JEAN, et al.	3:20-cv-09527
ZURANSKI, KAREN, et al.	3:20-cv-11171
MAZGAJ, JOAN, et al.	3:20-cv-11173
LABARBERA, PHILIP CONRAD, et al.	3:20-cv-12390
NAYSHLOS, IRINA, et al.	3:20-cv-12391
KISSOON, MOHABIR, et al.	3:20-cv-12393
CUTLIP, TERRA L, et al.	3:20-cv-13069
SUAREZ, PAUL, et al.	3:20-cv-13112

Come now the above captioned Plaintiffs by and through their undersigned counsel of record, and respectfully submit the following Response to the Court's April 16, 2025, Order to Show Cause Why Cases on the Attached Exhibit A Should Not be Dismissed with Prejudice (Dkt. 33664).

In Summary:

1. There was no good-faith basis for Defendants' Order to Show Cause as to these Plaintiffs.
2. **Defendants were timely and properly served with each and every one of these Plaintiffs' PPFs via MDL Centrality over a year ago. (Exhibit A)**

3. Defendants have been in possession of each and every one of these Plaintiffs' PPFs for over a year.
4. Defendants knew or should have known each and every one of these Plaintiffs timely and properly served their respective PPFs.
5. Defendants either (a) made no effort to determine if any of these 54 Plaintiffs had served their PPFs or (b) inexplicably "missed" 54 PPFs Defendants had been served with a year ago or (c) simply did not care.
6. Finally, Defendants failed to meet and confer which would have obviated the Order to Show cause for these Plaintiffs.

As Noted Above:

On May 25, 2024, each and every one of the Plaintiffs listed on the Order's attached Exhibit A at Row ## 34-44, 46-53, 55-72, 74, 75, 77-91 (Dkt. 33664 at pp. 4-6) served Defendants with their Plaintiff Profile Forms via MDL Centrality pursuant the Plaintiff's Profile Form ("PPF") Order (Dkt. 19911).

Attached hereto as **Exhibit A** is a spreadsheet providing the Plaintiff ID in MDL Centrality and the "Original PPF Date" of PPF service for each and every Plaintiff should this Court or Defendants wish to confirm submission dates.

Further, at no time did Defendants attempt to contact the undersigned to meet and confer in good faith as required by the Plaintiff's Profile Form ("PPF") Order.

As such, regarding the Plaintiffs identified on the Order's attached Exhibit A identified at Row ## 34-44, 46-53, 55-72, 74, 75, 77-91, Plaintiffs respectfully request the denial the relief requested together with such other and further relief as deemed proper.

Dated: April 25, 2025

Respectfully Submitted by,

GOLDSTEIN GRECO, P.C.

/s/ Brian A. Goldstein

Brian A. Goldstein

Counsel for Plaintiffs

2354 Wehrle Drive

Buffalo, New York 14221

(844) 716-4653

(716) 568-9090 (Facsimile)

bg@goldsteingreco.com

CERTIFICATE OF SERVICE

I hereby certify that on April 25, 2025, I electronically filed the foregoing document with the Clerk of the Court using the CM/ECF system which will send the notification of such filing to all attorneys of record.

/s/ Brian A. Goldstein